

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

AUG 16 2005

CHARLOTTE S. REYNOLDS

Plaintiff,

v.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA, d/b/a
PRUDENTIAL FINANCIAL, a corporation
and LINDA CLAYTON, individually and on
behalf of the ESTATE OF FRANCIS HILL,

Defendants.

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Case No.:

05C 4701

JUDGE CASTILLO

MAGISTRATE JUDGE LEVIN

NOTICE OF FILING

TO:

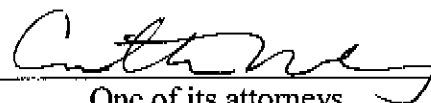
Scott A. Blumenshine
Law Office of Meyer and Blumenshine
221 N. LaSalle Street, Suite 1800
Chicago, Illinois 60601

Linda Clayton
c/o Emerald, Amethyst Farm
19505 NW 184th Ter
High Springs, FL 32643

PLEASE TAKE NOTICE that on August 16, 2005, we caused to be filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, **Defendant The Prudential Insurance Company of America's Notice of Removal of Cause**, a copy of which is attached and hereby served upon you.

Respectfully submitted,

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA


One of its attorneys

Daniel J. McMahon
Cynthia G. Motley
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP
120 N. LaSalle Street, Suite 2600
Chicago, Illinois 60602
(312) 704-0550
(312) 704-1522 (fax)

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the above and foregoing pleading was served on:

Scott A. Blumenshine
Law Office of Meyer and Blumenshine
221 N. LaSalle Street, Suite 1800
Chicago, Illinois 60601
(312) 263-1000

Linda Clayton
c/o Emerald, Amethyst Farm
19505 NW 184th Ter
High Springs, FL 32643
(386) 462-0781

by: ☐ hand-delivery; ☐ facsimile; ☐ overnight mail, next day delivery; and/or ☒ depositing same in the US Mail at 120 N. LaSalle Street, Chicago, Illinois 60602 with proper postage prepaid, at or before the hour of 5:00 p.m. this 16th day of August 2005.


Cynthia G. Motley

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AUG 16 2005

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

CHARLOTTE S. REYNOLDS)

Plaintiff,)

v.)

THE PRUDENTIAL INSURANCE)
COMPANY OF AMERICA, d/b/a)
PRUDENTIAL FINANCIAL, a corporation)
and LINDA CLAYTON, Individually and on)
behalf of the ESTATE OF FRANCIS HILL,)

Defendants.)

Case No. :

05C 4701

JUDGE CASTILLO

MAGISTRATE JUDGE LEVIN

NOTICE OF REMOVAL OF CAUSE

TO:

Scott A. Blumenshine
Law Office of Meyer and Blumenshine
221 N. LaSalle Street, Suite 1800
Chicago, Illinois 60601

Linda Clayton
c/o Emerald, Amethyst Farm
19505 NW 184th Ter
High Springs, FL 32643

Defendant THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, ("Defendant" and "Prudential"), pursuant to 28 U.S.C. § 1446 and the Rules of the United States District Court for the Northern District of Illinois, notifies this Honorable Court that the above-entitled cause has been removed from the Circuit Court of Cook County, Chancery Division, Chicago, Illinois, and in support of said notice states as follows:

1. The Summons and Complaint in this matter were served on Defendant on July 18, 2005 through its agent. Copies of the Summons and Complaint are attached hereto as **Exhibit A**. The Summons and Complaint are the only pleadings that have been received by Defendant.

2. The Complaint, which seeks proceeds from three life insurance policies, purports to state a cause of action for breach of contract. Defendant denies it is liable to Plaintiff for any of the relief sought in the Complaint.

3. Defendant seeks to remove this matter to this Court on the ground and for the reasons that the parties at issue are of diverse citizenship and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

AMOUNT IN CONTROVERSY

4. Plaintiff's Complaint purports to state a cause for declaratory judgment based upon the allegation that Defendant has failed and refused to pay death benefits in the approximate amount of \$52,000 under three life insurance policies issued by Defendant on the life of Francis Hill, now deceased. Ex. A at p. 2, ¶5 and p. 4 of 5 of Exhibit C of Plaintiff's Complaint.

5. Plaintiff's Complaint also seeks payment in an amount in excess of \$50,000 under 215 ILCS 5/155 of the Illinois Insurance Code based upon the allegation of unreasonable and vexatious delay by the Defendant.

6. Accordingly, the amount in controversy exceeds the \$75,000 jurisdictional amount required.

DIVERSITY

7. Plaintiff, Charlotte S. Reynolds, is a citizen of Illinois.

8. Defendant, Prudential is a corporation with its principal place of business in New Jersey.

9. Defendant, Linda Clayton, individually and on behalf of the Estate of Francis Hill, is a resident of Florida.

10. Complete diversity exists between the parties at issue in this matter.

11. This Court has original jurisdiction over this action under 28 U.S.C. § 1332. Defendant is, therefore, entitled to remove this action to this Court pursuant to 28 U.S.C. §§ 1332, and 1441.

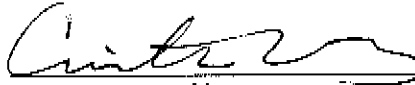
12. In compliance with 28 U.S.C. § 1446(b), this Notice of Removal is filed with this Court within thirty (30) days after receipt of a copy of the initial pleading setting forth the claim for relief upon which this action or proceeding is based and within thirty (30) days after service of summons.

13. Co-Defendant, Linda Clayton, individually and on behalf of the Estate of Francis Hill, consents with, and joins in, this removal.

WHEREFORE, Defendant THE PRUDENTIAL INSURANCE COMPANY OF AMERICA notifies that this cause has been removed from the Circuit Court of Cook County, Chancery Division, Chicago, Illinois, to the United States District Court for the Northern District of Illinois, pursuant to the provisions of 28 U.S.C. § 1446 and the Rules of the United States District Court for the Northern District of Illinois.

Respectfully submitted,

**THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA**


One of its attorneys

Daniel J. McMahon
Cynthia G. Motley
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP
120 N. LaSalle Street, Suite 2600
Chicago, Illinois 60602
(312) 704-0550
(312) 704-1522 (fax)

CONSENT TO REMOVAL

The undersigned, individually and on behalf of the Estate of Francis Hill, hereby consents to, and joins in, the above and foregoing notice of removal.

Linda Clayton, individually and on behalf of the
Estate of Francis Hill,

By: Linda Clayton *by telephone*
Linda Clayton *Consent*
c/o Emerald, Amethyst Farm
19505 NW 184th Ter
High Springs, FL 32643
(386) 462-0781

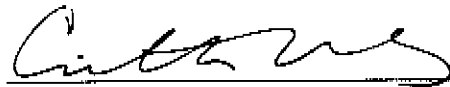
CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the above and foregoing pleading was served on:

Scott A. Blumenshine
Law Office of Meyer and Blumenshine
221 N. LaSalle Street, Suite 1800
Chicago, Illinois 60601
(312) 263-1000

Linda Clayton
c/o Emerald, Amethyst Farm
19505 NW 184th Ter
High Springs, FL 32643
(386) 462-0781

by: ☐ hand-delivery; ☐ facsimile; ☐ overnight mail, next day delivery; and/or ☒ depositing same in the US Mail at 120 N. LaSalle Street, Chicago, Illinois 60602 with proper postage prepaid, at or before the hour of 5:00 p.m. this 16th day of August 2005.


Cinthia G. Motley

RECEIVED
IDPPR

JUL 18 2005

DIV. OF INSURANCE
CHICAGO, ILLINOIS

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

CHARLOTTE S. REYNOLDS,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA, d/b/a PRUDENTIAL FINANCIAL,
a corporation and LINDA CLAYTON,
Individually and on behalf of the Estate of
FRANCIS HILL,

Defendants.

No.

05CH11933

FILED-3
05 JUL 18 PM 11:09
CHICAGO, ILLINOIS

COMPLAINT

COUNT 1 - DECLARATORY JUDGMENT

NOW COMES the Plaintiff, **CHARLOTTE S. REYNOLDS**, by and through her attorneys, **LAW OFFICES OF MEYER AND BLUMENSHINE**, and complaining against the Defendant, **THE PRUDENTIAL INSURANCE COMPANY OF AMERICA**, doing business as **PRUDENTIAL FINANCIAL** (herein "**PRUDENTIAL**"), states as follows:

1. Plaintiff, **CHARLOTTE S. REYNOLDS**, is the owner and beneficiary of three life insurance policies on the life of Francis Hill, issued by Defendant, **PRUDENTIAL INSURANCE**, under policy numbers 13 091 409, 73 452 701 and D80 742 558 (herein "the subject policies"). Copies of Prudential "Policy Identification" forms are attached as "Exhibit A", "Exhibit B" and "Exhibit C".

- Exhibit A - Policy #13091409 - Owner & Beneficiary: Charlotte S. Reynolds
- Exhibit B - Policy #73452701 - Owner & Beneficiary: Charlotte S. Reynolds
- Exhibit C - Policy #D80742558 - Owner & Beneficiary: Charlotte S. Reynolds

EXHIBIT

A

(A copy of said policies are unavailable to Plaintiff and are more readily available to Defendant).

2. **PRUDENTIAL**, by and through its Agent and employee Alan J. Jackson facilitated transfer of policy ownership and beneficiary rights to the Plaintiff, **CHARLOTTE S. REYNOLDS**, in 1999.

3. The subject policies provided for the payment of Death Benefits to Charlotte Hill upon the death of Francis Hill. Francis Hill passed on March 13, 2005. The Plaintiff, **CHARLOTTE S. REYNOLDS**, is thus due and owed the benefits of the subject policies.

4. Plaintiff, **CHARLOTTE S. REYNOLDS**, tendered good and valuable consideration including room, board, necessities and companionship in exchange for policy ownership and beneficiary rights. She has complied with all policy conditions and otherwise cooperated with Defendant, **PRUDENTIAL**.

5. Defendant, **PRUDENTIAL**, has failed and refused to pay the benefits to Plaintiff, **CHARLOTTE S. REYNOLDS**, despite Plaintiff's repeated requests for payment.

6. As a result of Defendant, **PRUDENTIAL'S**, failure to pay said benefits, the Plaintiff, **CHARLOTTE S. REYNOLDS**, has sustained damages including economic loss of policy proceeds and gains therefrom, attorney's fees and legal costs.

7. The Illinois Code of Civil Procedure 735 ILCS 5/2-701 authorizes the Court to enter a binding declaration of rights in cases of actual controversy such as the present matter.

WHEREFORE, Plaintiff, **CHARLOTTE S. REYNOLDS**, requests this Honorable Court enter an order of declaratory judgment finding that Defendant, **PRUDENTIAL**, is obligated to pay policy benefits to **CHARLOTTE S. REYNOLDS** and that **PRUDENTIAL** is to pay the Plaintiff accrued interest, costs and attorney's fees.

COUNT II - SECTION 155 - PENALTIES AND FEES

1.-7. Plaintiff, **CHARLOTTE S. REYNOLDS**, adopts and incorporates Paragraphs 1-7 of Count I as if specifically alleged herein.

8. At all times, Defendant, **PRUDENTIAL**, owed Plaintiff, **CHARLOTTE S. REYNOLDS**, a duty of good faith and fair dealing.

9. The Illinois Insurance Code provides for the payment of an insured's attorney's fees, costs and penalties as a result of an insurer's unreasonable and vexatious delay in handling a claim. 215 ILCS/155.

10. The Illinois Insurance Code provides penalties in the following amounts for unreasonable and vexatious conduct by an insurer:

- (a) 60% of the amount which the insured is entitled to recover;
- (b) \$60,000.00;
- (c) the difference between the amount which the insured is entitled to recover and the amount which the company offered. 215 ILCS 5/155.

11. The Illinois Insurance Code provides that Improper Claims Practices include:

- (a) Not attempting in good faith to effectuate prompt, fair and equitable settlements of claims submitted in which liability has become reasonably clear.
- (b) Compelling policyholders to institute suit to recover amounts due under its policies by offering substantially less than the amounts ultimately recovered in suit brought by them.
- (c) Failing to adopt and implement reasonable standards for the prompt investigation and settlement of claims arising under its policies. 215 ILCS 5/154.6.

12. Defendant, **PRUDENTIAL**, failed to conduct a proper investigation into the claims of **LINDA CLAYTON**, and has improperly adjusted the Plaintiff's claim.

13. Defendant, **PRUDENTIAL**, has failed and refused to release policy benefits to policy owner and beneficiary Plaintiff, **CHARLOTTE S. REYNOLDS**, or enter settlement negotiations, or offer any settlement in any amount.

14. Defendant, **PRUDENTIAL'S**, actions have been for the sole purpose of delaying a prompt and just resolution of Plaintiff's claim.

WHEREFORE, Plaintiff, **CHARLOTTE S. REYNOLDS**, requests a finding of unreasonable and vexatious delay by the Defendant, **PRUDENTIAL**, and judgment against the Defendant, **PRUDENTIAL**, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees, interest and the costs of this action.

COUNT III - TORTIOUS INTERFERENCE WITH CONTRACT -
LINDA CLAYTON AND THE ESTATE OF FRANCIS HILL

1.-6. Plaintiff adopts and incorporates paragraphs 1-6 of Count I as if fully alleged herein.

7. Defendant, **LINDA CLAYTON**, individually and allegedly on behalf of the Estate of Francis Hill, contacted the Defendant, **PRUDENTIAL**, and falsely alleged her right to the subject policy proceeds.

9. Defendant, **LINDA CLAYTON'S** contact with Defendant, **PRUDENTIAL**, and the Plaintiff in Illinois has been for the sole purpose of wrongfully enriching herself and depriving the Plaintiff, **CHARLOTTE S. REYNOLDS**, of policy benefits.

10. Defendant, **LINDA CLAYTON'S** conduct in claiming a right to the subject policy proceeds has caused a delay and denial of payment to Plaintiff **CHARLOTTE S. REYNOLDS**. She has sustained damage as a result of Defendant's conduct.

11. Defendant, **LINDA CLAYTON'S** conduct constitutes a tortious interference with the Plaintiff, **CHARLOTTE S. REYNOLDS'** insurance policy benefit expectancy.

WHEREFORE, Plaintiff, **CHARLOTTE S. REYNOLDS**, requests this Honorable Court enter judgment in her favor and against the Defendant, **LINDA CLAYTON**, individually and on behalf of the Estate of Francis Hill in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action.

Respectfully submitted,



Scott A. Blumenshine

LAW OFFICES of MEYER and BLUMENSHINE
221 North LaSalle Street, Suite 1800
Chicago, Illinois 60601
312-263-1000
Attorney No.: 37241

Life

Policy Number 13081409

POLICY IDENTIFICATION

Policy Number:
 Date Updated:
 Plan Type:
 Contact's Name:
 Issue Age:

13081409
 08/21/2000
 Whole Life
 Francis M Hill
 21

POLICY INFORMATION

Premium/Mode:
 Plan Name:
 Policy Date:
 Policy Number:
 Basic Face:
 Net Death Benefit:
 Premium:
 Annualized Premium:
 Status:
 Paid To Date:
 Current Dividend:
 Dividend Option:
 Accum:
 Increase in Cash Value:
 Cash Value:
 CSV of PUA/Net CSV:
 Loan Amount:
 Loan Int Amt:
 Rate:

103.30 / Annual
 MOD 5
 08/22/1944
 13081409
 3,500.00
 8,329.40
 103.30
 103.30
 Premium paying
 08/22/2001
 255.90
 Reduce Premium
 1,329.40
 55.00
 3,260.00
 0.00 / 5,189.40
 0.00
 0.00
 08.000 FIXED

POLICY PROVISIONS

Owner:
 Beneficiary:
 Relationship & Type:
 Beneficiary:
 Relationship & Type:
 Settlement Option:
 DB Option:
 Rating:
 LNB:

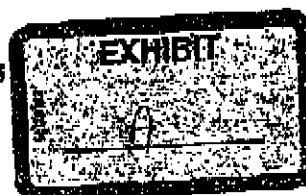
Charlotte S Reynolds
 Charlotte S Reynolds
 Comp-Ord & Co-
 Ralph Hill
 On- & 18
 Lump Sum

Standard
 Not Selected

SUPPLEMENTARY BENEFITS

ADB Rider:
 WP (Y/N):
 OPAI AMT/Date:

5,000.00
 NO



Life

Policy Number 73452701

POLICY IDENTIFICATION

Policy Number:	73452701
Date Updated:	09/13/2000
Plan Type:	Whole Life
Contact's Name:	Francis M Hill
Issue Age:	62

POLICY INFORMATION

Premium/Mode:	122.05 / Monthly
Plan Name:	ESTATE WL
Policy Date:	10/11/1985
Policy Number:	73452701
Basic Face:	30,000.00
Net Death Benefit:	40,390.72
Premium:	122.05
Annualized Premium:	1,464.60
Status:	Premium paying
Paid To Date:	10/11/2000
Current Dividend:	694.50
Dividend Option:	Paid Up Additions
Accum:	0.00
Increase in Cash Value:	949.50
Cash Value:	12,725.40
CSV of PUA/Net CSV:	8,583.47 / 21,308.87
Loan Amount:	0.00
Loan Int Amt:	0.00
Rate:	07.560 MOODY

POLICY PROVISIONS

Owner:	Charlotte S Reynolds
Beneficiary:	Charlotte S Reynolds
Relationship & Type:	Corp-Ord/Uniform Act & 11
Settlement Option:	Lump Sum
DB Option:	
Rating:	Not Selected
LNB:	

SUPPLEMENTARY BENEFITS

ADS Rider:	0.00
WR (Y/N):	NO
OPAI AMT/Date:	



Life

Policy Number D80742558

POLICY IDENTIFICATION

Policy Number: D80742558
 Date Updated: 09/11/2000
 Plan Type: Whole Life
 Contact's Name: Francis M Hill
 Issue Age: 63

POLICY INFORMATION

Premium Mode: 28.00 / Monthly
 Plan Name: LSO FDR
 Policy Date: 05/16/1988
 Policy Number: D80742558
 Basic Face: 5,000.00
 Net Death Benefit: 5,447.60
 Premium: 29.00
 Annualized Premium: 348.00
 Status: Premium paying
 Paid To Date: 10/16/2000
 Current Dividend: 110.85
 Dividend Option: Paid Up Additions
 Accruals: 0.00
 Increase in Cash Value: 169.00
 Cash Value: 2,000.45
 CSV of PUA/Net CSV: 1,058.07 / 3,148.52
 Loan Amount: 0.00
 Loan Int Amt: 0.00
 Rate: 08.000 Fixed DR

POLICY PROVISIONS

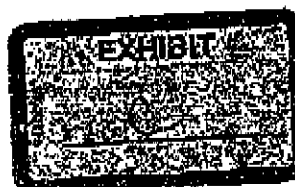
Owner: Charlotte S Reynolds
 Beneficiary: Charlotte S Reynolds
 Relationship & Type: Dmp Ord & fu
 Beneficiary: Ralph Hill
 Relationship & Type: On- & 51
 Settlement Option: Lump Sum
 DB Option:
 Rating: Not Selected
 LNB:

SUPPLEMENTARY BENEFITS

ADB Rider: 0.00
 WP (Y/N): NO
 OPAI AMT/Date:

LIFE TOTAL

Total Benefit: 61,835.22
 Total Annual Premium: 1,916.90
 Total Cash Value: 29,644.79





Illinois Department of Financial and Professional Regulation
Division of Insurance

ROD R. BLAGOJEVICH
Governor

FERNANDO R. GRILLO
Secretary

Michael T. McRaith
Director
Division of Insurance

July 21, 2005

The Prudential Insurance Company of America
Corporate Comptroller's - Accounting
213 Washington Street 9th Floor
Newark, New Jersey 07102-2992

Re: Case Number: 05 CH 11933

Gentlemen:

Enclosed please find copy of Summons and Complaint served on me as your agent for service of process on July 18th at 4:00 p.m. at my Chicago Office in the case of Charlotte S. Reynolds, vs. your company et al.

Sincerely,

Michael T. McRaith

Michael T. McRaith
Director

MTM:BAB:msc
Encl.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

120 - Served
220 - Not Served
320 - Served By Mail
420 - Served By Publication
SUMMONS

2121 - Served
2221 - Not Served
2321 - Served By Mail
2421 - Served By Publication
ALIAS - SUMMONS

RECEIVED
IDPPH

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JUL 18 2005

DIV. OF INSURANCE
CHICAGO, ILLINOIS

CHARLOTTE S. REYNOLDS,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA, d/b/a PRUDENTIAL
FINANCIAL, a corporation and LINDA
CLAYTON, individually and on behalf of the
Estate of FRANCIS HILL,

Defendants.

No.

05CH11933

PLEASE SERVE:

PLEASE SEE SUMMONS SERVICE LIST
ATTACHED

SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the office of the Clerk of this Court (located in the Richard J. Daley Center, Room 801, Chicago, Illinois 60602) within 30 days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its date.

WITNESS, _____, 20

Name Law Offices of Meyer and Blumenshine
Attorney for Plaintiff
Address 221 North LaSalle Street, #1800
City/Zip Chicago, IL 60606
Telephone 312/263-1000
Atty. No. 37241

Date of Service: _____, 20

(To be inserted by officer on copy left with
(defendant or other person)

**Service by Facsimile Transmission will be accepted at: _____
(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Law Division 801
Chancery Division Room 802
County Division Room 1202
Probate Division Room 1202

NOTICE TO EACH DEFENDANT

1. This case will not be heard on the day for appearance specified above. If you have filed your written appearance or answer, you need not appear in person on that day.
2. If the complaint is notarized, your answer must be notarized.
3. On the day for appearance specified above, the following will occur:
 - a. If you have not obeyed this summons, a judgment or an order of default will be entered against you. Judgment is entered only in the amount claimed is liquidated, the complaint is notarized, and a military affidavit is filed. Otherwise proof will be taken in Room _____ and judgment may be entered.
 - b. If you are sued for \$2500 or less you need not file an answer unless ordered to do so by the court. Your case will be assigned for trial after the day for appearance specified above in a courtroom designated by the Presiding Judge.
 - c. In all other cases, if you have filed your appearance on time, you must file your answer not later than 10 days after the day for appearance specified above. On the day for appearance your case will be postponed 21 days to the Default-for-Want-of-Answer Call at 11:00 A.M., in Room _____. On the Default-for-Want-of-Answer Call, if you have not filed your answer, your case will be postponed for trial on a date in a courtroom designated by the Presiding Judge.
4. Late filing of an appearance or answer will not relieve you from a judgment or default order except by court order.
5. Trial rights of property, Detainers, and Revivals of judgment are returnable in Room _____ and are disposed of on a return day unless otherwise ordered by the Court.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY

Reynolds v. The Prudential Insurance Company of America, et al.

SUMMONS SERVICE LIST

The Prudential Insurance Company of America
c/o Illinois Division of Insurance
100 West Randolph Street
Suite ~~5-570~~ 9-361
Chicago, IL 60601

Linda Clayton
19505 N.W. 184th Terrace
High Springs, Florida 32643
TO BE SERVED BY SHERIFF OF ALACHUA COUNTY, FLORIDA